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*Attorneys for B&G Foods, Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEW JERSEY**

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PATRICIA DEAN, JOHN GALLOWAY,  
and BRIAN BLASSINGAME, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

B&G FOODS, INC.,

Defendant.

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Case No.: 2:22-CV-01338-SDW-JSA

**DECLARATION OF PRATIK K. RAJ  
GHOSH, ESQ. IN SUPPORT OF  
DEFENDANT B&G FOODS, INC.'S  
MOTION TO DISMISS PLAINTIFFS'  
FIRST AMENDED CLASS ACTION  
COMPLAINT**

Motion Date: July 18, 2022

*[Motion to Dismiss, Request for Judicial  
Notice, and [Proposed] Orders Filed  
Concurrently Herewith]*

I, Pratik K. Raj Ghosh, Esq., declare:

1. I am counsel of record for Defendant B&G Foods, Inc. (“B&G Foods”) in the above-captioned action. I make this declaration based on personal knowledge. If called as a witness, I could, and would, testify competently to the facts stated herein.

2. Attached as **Exhibit A** is a true and correct copy of the complaint that Plaintiffs’ counsel filed—and shortly thereafter withdrew—on behalf of Brian Blassingame in the Northern District of California. Much of the original complaint in the instant litigation is copied verbatim from the complaint in the now-dismissed *Blassingame* action.

3. Attached as **Exhibit B** is a true and correct copy of an email thread between myself and Kevin Laukaitis, Esq., counsel for Plaintiffs, regarding Plaintiffs’ request for an extension to amend their complaint.

I declare under penalty of perjury that the foregoing is true and accurate.

Dated: June 14, 2022

Respectfully submitted,

By: s/ Pratik Ghosh

Pratik K. Raj Ghosh, Esq.\*

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